

Judge: Hon. Marc L. Barreca
Chapter: 7
Hearing Date: October 23, 2014
Hearing Time: 9:30 a.m.
Hearing Site: 700 Stewart St, 7106
Seattle, WA 98101
Response Date: October 16, 2014

UNITED STATES BANKRUPTCY COURT FOR THE
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

In re:

KENNETH LORENZ

KAREN LORENZ,

Debtors.

EDMUND J. WOOD, solely in his capacity as
the Chapter 7 Trustee of the estate of
Kenneth and Karen Lorenz,

Plaintiff,

vs.

KENNETH LORENZ and KAREN LORENZ,
husband and wife and the marital community
composed thereof,

Defendants.

Bankruptcy Case No. 14-12159

Adversary No. 14-1349

DECLARATION OF EDMUND J.
WOOD IN SUPPORT OF TRUSTEE'S
OBJECTION TO DEBTORS' MOTION
TO DISMISS COMPLAINT

EDMUND J. WOOD declares under penalty of perjury under the laws of the
State of Washington as set forth below.

1. I am over the age of 21 and am competent to make this declaration.
2. I am the Chapter 7 Trustee appointed in this matter.
3. Attached hereto as Exhibit 1 is a true and correct copy of an email
exchange between Mr. Smoot and I dated April 10- April 13, 2014.
4. Attached hereto as Exhibit 2 is a true and correct copy of an email from
Mr. Smoot to me, along with the attachments, dated April 22, 2014.

DECLARATION OF EDMUND J. WOOD IN SUPPORT OF
TRUSTEE'S OBJECTION TO DEBTOR'S MOTION
TO DISMISS ADVERSARY PROCEEDING
Page 1

Wood & Jones, P.S.
303 N. 67th Street
Seattle WA 98103
(206)-6238-4382

5. Attached hereto as Exhibit 3 is a true and correct copy of an email exchange between Denice Moewes, Jeff Smoot, Marsha Honda (a legal assistant in our office) and myself.

Signed and dated this 16th day of October, 2014 at Seattle, Washington.

/s/Edmund J. Wood
Edmund J. Wood

EXHIBIT“1”

From: ewood1 <ewood1@aol.com>
To: jeff <jeff@highpointlawgroup.com>
Subject: Re: Lorenz 14-12159
Date: Sun, Apr 13, 2014 1:28 pm

Jeff - I'm fine with that if you want to file a stip. for extension of the discharge date -- that would give more flexibility. The continuance would be to May 15th at 4:00 p.m.

Edmund J. Wood

303 N. 67th Street
Seattle WA 98103

Tel: (206) 623-4382
Fax: (206) 224-4895

-----Original Message-----

From: Jeff Smoot <jeff@highpointlawgroup.com>
To: ewood1 <ewood1@aol.com>
Sent: Thu, Apr 10, 2014 12:00 pm
Subject: Lorenz 14-12159

Ed,

Just so you are aware, Mr. Lorenz was diagnosed with myasthenia gravis shortly after the petition date, and has been hospitalized for the past five days due to difficulty breathing. He is supposed to be released today, and we will renew our efforts to get the balance of schedules completed and also to get the rule 4002 documents to you by next week.

This may be a case where I request a continuance of the 341 meeting, depending on his condition and our ability to get everything filed quickly. Is this a case where you would want to continue the 341 meeting since the balance of schedules are not due now until just a few days prior?

Jeffrey L. Smoot | Attorney
Highpoint Law Group|PLLC
5400 California Avenue SW, Suite D
Seattle, WA 98136
(206) 999-8375
www.highpointlawgroup.com

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EXHIBIT “2”

From: Jeff Smoot <jeff@highpointlawgroup.com>

To: ewood1 <ewood1@aol.com>

Subject: Lorenz 14-12159

Date: Tue, Apr 22, 2014 10:13 am

Attachments: Agreed_Order_Continuing_341_Meeting_of_Creditors.pdf (116K),
Order_Extending_Deadline_to_Object_to_Discharge.pdf (118K)

Ed,

Mr. Lorenz's condition hasn't improved, and we haven't been able to complete the balance of schedules, etc., so we would like to continue the 341 meeting and extend the discharge deadline as we previously discussed. Attached are proposed orders. Please let me know if you approve and, if so, I will submit these today with a second request to extend the deadline for filing the balance of schedules.

~Jeff

Jeffrey L. Smoot | Attorney
Highpoint Law Group|PLLC
5400 California Avenue SW, Suite D

Seattle, WA 98136
(206) 999-8375
www.highpointlawgroup.com

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9 UNITED STATES BANKRUPTCY COURT
10 WESTERN DISTRICT OF WASHINGTON, SEATTLE DIVISION

11 In re:

12
13 KENNETH R. LORENZ; and
14 KAREN A. LORENZ

15 Debtors.
16

No. 14-12159-MLB

**17 AGREED ORDER EXTENDING
18 DEADLINE TO OBJECT TO
19 DISCHARGE**

20 As evidenced by the signatures below, Edmund J. Wood, chapter 7 trustee, and Kenneth
21 R. Lorenz and Karen A. Lorenz (the "Debtors"), agree to entry of this order extending the
22 deadline to file objections to discharge pursuant to 11 U.S.C. § 727 in the above-captioned case.

23 Based on the foregoing,

24 IT IS HEREBY ORDERED THAT the deadline to file objections to the Debtors'
25 discharge is hereby extended to and including August 25, 2014.

26 ///END OF ORDER///

AGREED ORDER EXTENDING DEADLINE TO
OBJECT TO DISCHARGE - 1
{00162/Lorenz/.DOC}

HIGHPOINT LAW GROUP|PLLC
5400 CALIFORNIA AVENUE SW, SUITE D
SEATTLE, WA 98136-1501
PHONE 206 999-8375
E-mail highpointlawgroup@gmail.com

1 Presented by:

2
3 HIGHPOINT LAW GROUP PLLC
4

5 /s/ Jeffrey L. Smoot

6 Jeffrey L. Smoot, WSBA #39335

7 Attorneys for Debtors
8
9

10 Agreed as to form and content; notice of presentation waived:
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13 Edmund J. Wood, WSBA #3695

14 Chapter 7 Trustee
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9 UNITED STATES BANKRUPTCY COURT
10 WESTERN DISTRICT OF WASHINGTON, SEATTLE DIVISION

11 In re:

12
13 KENNETH R. LORENZ; and
14 KAREN A. LORENZ

15 Debtors.
16

No. 14-12159-MLB

17 AGREED ORDER CONTINUING 341
18 MEETING OF CREDITORS

19 As evidenced by the signatures below, Edmund J. Wood, chapter 7 trustee, and Kenneth
20 R. Lorenz and Karen A. Lorenz (the "Debtors"), agree to entry of this order continuing the 341
21 Meeting of Creditors.

22 Based on the foregoing,

23 IT IS HEREBY ORDERED THAT the 341 Meeting of Creditors is continued from April
24 24, 2014 at 2:30 p.m. to May 15, 2014 at 4:00 p.m.

25 ///END OF ORDER///
26

AGREED ORDER EXTENDING DEADLINE TO
OBJECT TO DISCHARGE - 1
{00162/Lorenz/.DOC}

HIGHPOINT LAW GROUP|PLLC
5400 CALIFORNIA AVENUE SW, SUITE D
SEATTLE, WA 98136-1501
PHONE 206 999-8375
E-mail highpointlawgroup@gmail.com

1 Presented by:

2
3 HIGHPOINT LAW GROUP PLLC

4
5 /s/ Jeffrey L. Smoot

6 Jeffrey L. Smoot, WSBA #39335

7 Attorneys for Debtors

8
9
10 Agreed as to form and content; notice of presentation waived:

11
12
13 Edmund J. Wood, WSBA #3695

14 Chapter 7 Trustee

EXHIBIT “3”

From: Marsha Honda <marshahonda@aol.com>

To: Smoot <Smoot@OLES.com>

Cc: Dmoewes <Dmoewes@aol.com>; ewood1 <ewood1@aol.com>; tessmkent <tessmkent@aol.com>

Subject: Re: Lorenz

Date: Mon, Jul 28, 2014 1:41 pm

Attachments: 59Lorenz-2ndAgreedOrderExtendingDeadlinetoObjecttoDischarge.rtf (82K)

Mr. Smoot,

Attached is the proposed agreed order for your review. After consideration of Denice's current situation and review of the documents by the Trustee, Mr. Wood would ask that the agreed extension set the deadline to September 1st to "pad" for any unforeseen complications. Please do not hesitate to contact myself or Tess Kent at the number below, if you have any questions or concerns.

Marsha Honda
Legal Assistant
Wood & Jones, P.S.
303 N. 67th St.

Seattle, WA 98103-5209

(206) 623-4382 FAX: (206) 224-4895

see also Mr. Wood's trustee page at: <http://www.trusteblogs.com/trusteewood.aspx>

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-----Original Message-----

From: Jeffrey L. Smoot <Smoot@OLES.com>

To: marshahonda <marshahonda@aol.com>

Cc: Dmoewes <Dmoewes@aol.com>

Sent: Mon, Jul 28, 2014 9:42 am

Subject: RE: Lorenz

Marsha,

My clients will stipulate to a two-week extension of the deadline to object to discharge for the trustee only. Will you send me a proposed stipulation and order?

Thank you.

Jeffrey L. Smoot | Partner

From: Jeffrey L. Smoot <Smoot@OLES.com>
To: marshahonda <marshahonda@aol.com>
Subject: 59Lorenz-2ndAgreedOrderExtendingDeadlinetoObjecttoDischarge.rtf
Date: Tue, Jul 29, 2014 11:00 am
Attachments: 59Lorenz-2ndAgreedOrderExtendingDeadlinetoObjecttoDischarge.rtf (82K)

I changed my law firm name in the signature block. Otherwise, this is fine. Thank you.

Jeffrey L. Smoot | Partner

Oles Morrison Rinker & Baker, LLP
701 Pike Street, Suite 1700 | Seattle, WA 98101
O: 206.623.3427 | F: 206.682.6234
smoot@oles.com | www.oles.com

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